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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

LESLIE FROHBERG and NANCY
HARDING, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

CUMBERLAND PACKING CORP.,

Defendant.

Case No. 1:14-cv-00748-RLM

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR AWARD OF
ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION
EXPENSES TO PLAINTIFFS' COUNSEL
AND INCENTIVE AWARDS TO THE
CLASS REPRESENTATIVES**

PLEASE TAKE NOTICE that on April 6, 2016, at 2:00 p.m., in the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, before the Honorable Roanne L. Mann, Plaintiffs Leslie Frohberg and Nancy Harding will, and hereby do, move the Court for an order granting payment of \$450,000 for Class Counsel's fees and expenses and payment of \$3,500 to each of the named plaintiffs (for a total of \$7,000) for their effort and contribution to this matter.

This motion is based upon this Notice of Motion; the accompanying Memorandum of Law; the Declaration of Michael R. Reese (ECF No. 55-3); the Declaration of Melissa W. Wolchansky (ECF No. 55-4); the Declaration of Leslie Frohberg (ECF No. 55-5); the Declaration of Nancy Harding (ECF No. 55-6); all the pleadings and documents on file in this action; and such other matters as may be presented at or before the hearing.

Date: February 22, 2016

Respectfully submitted,

By: /s/ Michael R. Reese

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Court Appointed Class Counsel